

JJD:MEF  
F. #2024R00945

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK  
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**TO BE FILED UNDER SEAL**

UNITED STATES OF AMERICA  
  
- against -

**COMPLAINT AND AFFIDAVIT  
IN SUPPORT OF ARREST  
WARRANT**

JAIRON ORTEGA-COREA,  
  
Defendant.

(18 U.S.C. § 1791)  
  
25-mj-56

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EASTERN DISTRICT OF NEW YORK, SS:

BRENDAN P. MOONEY, being duly sworn, deposes and states that he is a Special Agent with the Federal Bureau of Investigation (“FBI”), duly appointed according to law and acting as such.

In or about December 2024, within the Eastern District of New York and elsewhere, the defendant JAIRON ORTEGA-COREA, together with others, did knowingly and intentionally, in violation of a statute or a rule or order issued under a statute, provide and attempt to provide one or more prohibited objects, to wit: marijuana, cellular telephones and alcohol, to one or more inmates at the Metropolitan Detention Center in Brooklyn.

(Title 18, United States Code, Section 1791)

The source of your deponent’s information and the grounds for his belief are as follows:<sup>1</sup>

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<sup>1</sup> Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause to arrest the defendant, I have not described all the relevant facts and circumstances of which I am aware.

1. I am a Special Agent with the FBI and I have been since 2011. I am presently assigned to the FBI's Long Island Gang Task Force (the "Task Force"), which seeks to combat gang-related violence, including murders and assaults, as well as other dangerous gang activity, such as narcotics trafficking, weapons possession and trafficking, and money laundering, on Long Island and beyond. The Task Force is comprised of law enforcement agents and officers from federal, state, and local agencies and police departments, including and especially the Nassau County and Suffolk County Police Departments ("NCPD" and "SCPD," respectively). I am familiar with the facts and circumstances set forth below from my participation in the investigation; my review of the investigative file, including the defendant's criminal history record; and from reports of other law enforcement officers involved in the investigation.

#### La Mara Salvatrucha

2. The United States, including the FBI and the members of the Task Force, has been conducting an ongoing criminal investigation into the unlawful activities of the transnational criminal organization La Mara Salvatrucha, also known as the "MS-13," whose members operate throughout the United States, including maintaining a significant presence on Long Island, among other areas of the United States, and in Central America, particularly in El Salvador. In the United States, major MS-13 chapters, or "cliques," have been established in New York, Maryland, Virginia, North Carolina, Texas, California and elsewhere. On Long Island, MS-13 cliques have been established in various towns including Hempstead, Freeport, Uniondale, Westbury, Roosevelt, Huntington, Brentwood and Islip. The cliques routinely hold meetings to plan criminal activity, and members pay dues into a clique treasury. The treasury funds are used to purchase firearms and ammunition for use in gang-related activities, as well as

to purchase narcotics for resale by clique members, and to fill the commissaries of incarcerated leaders abroad.

3. Participation in criminal activity by an MS-13 member, especially violence directed at rival gang members or suspected police informants, increases the respect accorded to that member and could result in a promotion to a leadership position within the gang. On Long Island, MS-13 members and associates are frequently involved in violent altercations with members of rival gangs such as the 18th Street gang, Latin Pride, Salvadorans With Pride (“SWP”), the Latin Kings, the Bloods and the Goon Squad. Long Island MS-13 members have repeatedly carried out assaults, stabbings and shootings targeting members of rival gangs and others, including MS-13 members believed to be cooperating with law enforcement. Long Island MS-13 members and associates have committed dozens of murders on behalf of the gang. These members are from a variety of cliques, including but not limited to the Sailors Locos Salvatruchas Westside (“Sailors”) clique, the Leeward Locos Salvatruchas (“Leeward”) clique, the Brentwood Locos Salvatruchas (“BLS”) clique, the Guanacos Li'l Cycos Salvatruchas (“Guanacos”) clique, the Fulton Locos Salvatruchas (“Fulton”) clique, the Coronados Locos Salvatruchas (“Coronados”) clique, and the Hempstead Locos Salvatruchas (“HLS”) clique.

4. Investigations by the Task Force and other law enforcement authorities have resulted in the filing of numerous indictments, particularly in the Eastern District of New York (“EDNY”), charging hundreds of MS-13 members, including dozens of clique leaders, with inter alia federal racketeering for participating in murders, attempted murders and assaults, trafficking in narcotics, and carrying, brandishing and discharging firearms during crimes of violence. Defendants in the EDNY who are detained pending trial are principally housed at the Metropolitan Detention Center in Brooklyn (the “MDC”).

5. In January 2022, at a Bureau of Prisons (“BOP”) facility in Beaumont, Texas, several MS-13 members murdered two rival gang members.<sup>2</sup> Thereafter, BOP facilities began separating all MS-13 members and associates in their custody from other non-MS-13 inmates. This continues to be the case at the MDC, and presently, the majority of MS-13 members and associates housed there live in the same unit (the “MS-13 Unit”). In or about November and December 2024, there were over thirty defendants being housed in the MS-13 Unit.

6. Based on my training, experience and knowledge of the investigation, I am aware that numerous cellular telephones and other contraband items have been seized from inmates housed in the MS-13 Unit.<sup>3</sup> I am further aware that such telephones are often shared by multiple inmates, who pay to use them. A review of telephones seized from the MS-13 Unit since at least 2022 has revealed that MS-13 inmates at MDC regularly communicate on contraband phones with fellow gang members and associates, some of whom are incarcerated in other jail facilities and some of whom are at liberty across the United States and internationally, regarding gang business. Thus, notwithstanding their confinement, MS-13 inmates are able to use contraband phones in the jail to facilitate, approve and order acts of violence outside of the jail.

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<sup>2</sup> See Press Release, <https://www.justice.gov/usao-edtx/pr/7-ms-13-members-charged-double-murder-inside-federal-penitentiary-beaumont-texas>.

<sup>3</sup> For example, on or about January 27, 2022, investigators at MDC recovered a black Unihertz cellular telephone, a black L8Star cellular telephone, an 8.5-inch sharpened metal weapon and a quantity of a green leafy substance that later tested positive as marijuana from the cell assigned to a high-ranking MS-13 member housed at the MDC (“Co-Conspirator-1”). At the time, Co-Conspirator-1 admitted during a hearing that the seized items were his. Separately, on or about March 7, 2023, a search of the entire MS-13 Unit yielded 26 weapons, two cell phones, and numerous pieces of MS-13 related artwork.

The December 1, 2024 Smuggling Incident

7. As described in more detail below, on or about the morning of December 2, 2024, employees of the MDC located and recovered a package containing contraband (the “PACKAGE”) on the fourth-floor roof of the MDC. The PACKAGE contained the following: 18 cellular telephones; approximately 345 grams of a green-leafy substance believed to be marijuana<sup>4</sup>; 9 boxes of Newport cigarettes; 6 packages of Bluntville rolling paper; 1 package of Bob Marley rolling paper; 2 sets of earbuds with microphone; 17 charging cables; 10 black charging blocks; and 1 water bottle containing 1 Liter of clear liquid of drinking alcohol. A photo of the contents of the PACKAGE is below:



8. Subsequent interviews of MDC employees revealed that at least one person (“Witness-1”) observed the attempted introduction of the PACKAGE into the MDC. Specifically, on December 1, 2024 at approximately 8:30 p.m., Witness-1 observed movement near the corner of the MDC building at 29th Street and Second Avenue. After Witness-1 moved

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<sup>4</sup> On December 17, 2024, members of my team obtained the drug evidence from the MDC and brought it to the Suffolk County Crime Laboratory for analysis. The results of that analysis are pending. However, based on my training, experience, and knowledge of the investigation, including information provided by MDC, I believe this substance is likely marijuana.

closer, Witness-1 saw a long (approximately 2 feet in length by 6 inches in diameter) package being pulled by a rope towards the MDC building. Witness-1 estimated that the rope, which had appeared to be pieces of cloth that had been tied together, went up to the sixth to eighth floor of the MDC building. Around the same time, Witness-1 observed an older model Toyota that was light grey, gold or tan in color (the “TARGET VEHICLE”), which had circled the block around MDC at least two times. Inside of the TARGET VEHICLE were two men, who were 20 to 30 years old and white or Hispanic.

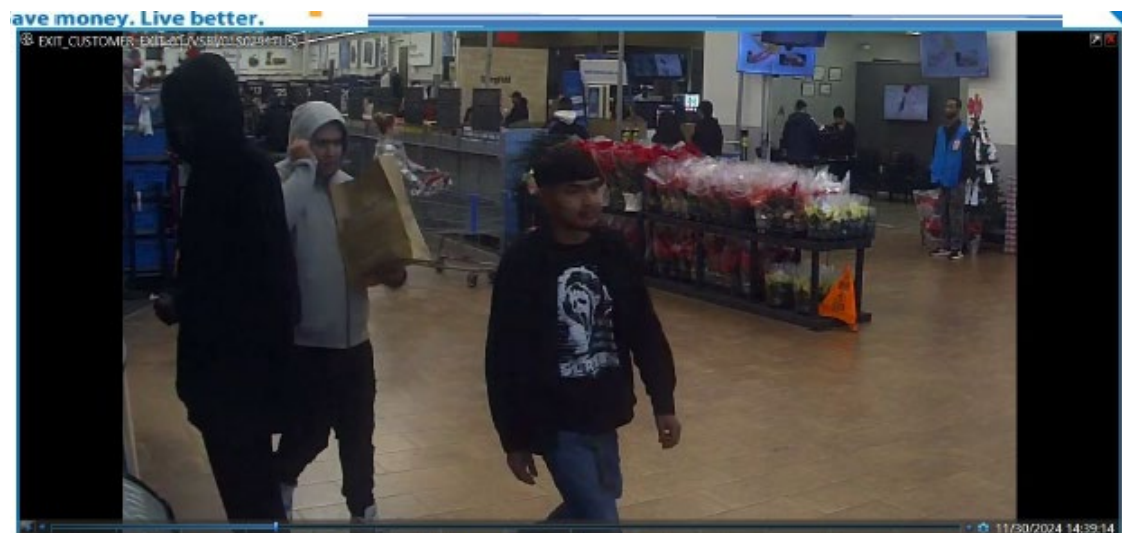
9. On the morning of December 2, 2024, MDC employees recovered the PACKAGE on the roof of the MDC building, in close proximity to where Witness-1 described having seen the line. The PACKAGE was wrapped in white and gray laundry bags, like the ones from the prison, and there was a water bottle and bar of soap also tied to the outside. Due to the location of the recovery, among other things, MDC investigators suspected that the PACKAGE was destined for the MS-13 Unit.

10. Later on December 2, 2024, MDC investigators conducted a search of the MS-13 Unit. Pursuant to that search, officers recovered two cellular telephones and several homemade weapons. One of the cellular telephones was assigned a number ending in 2450 (the “2450 PHONE”). Officers also observed a broken window on the second tier of the MS-13 Unit in an uninhabited cell that was left unlocked (the “CELL”). Based on my training, experience and knowledge of the investigation, I believe that the line used to draw the PACKAGE to the MDC roof originated from the CELL.

#### The Subsequent Investigation

11. After the retrieval of the PACKAGE, law enforcement obtained custody of the 18 cellular telephones from the PACKAGE and began tracing their point of purchase.

Based on business records obtained from Walmart, including receipts, approximately six of the cellular telephones recovered from the PACKAGE (the “Walmart Phones”) were purchased, using cash, on or about November 30, 2024 at approximately 2:30 p.m. at a Walmart, located at 1850 Veterans Hwy, Islandia, NY 11749 (the “Walmart”). A review of video surveillance from the Walmart further revealed that the Walmart phones were purchased by two men (the “TARGETS”). As explained in more detail below, I believe that the larger man in the gray hoodie sweatshirt is the defendant, JAIRON ORTEGA-COREA (hereinafter “ORTEGA-COREA or the “defendant”). Selected screenshots of the video images are below:



In the second image above, ORTEGA-COREA, who is wearing a grey hoodie sweatshirt, appears to be holding a cellular telephone to his face, as if on a call, as he was exiting the Walmart at approximately 2:39 p.m.

12. The video surveillance recovered further revealed that the TARGETS, when leaving the Walmart, were driving a metallic Toyota (the “TOYOTA”). An image is below:



13. A subsequent review of images and data obtained from a License Plate Reader (“LPR”) in the vicinity of the Walmart revealed that the TOYOTA was registered to the defendant’s mother. Additionally, a review of law enforcement databases revealed that the defendant had previously been stopped by police while either driving or riding as a passenger in the TOYOTA, including in 2023 and 2024.

14. Additionally, based on records received from the MDC (the “MDC Records”), the defendant is on the visiting list for Co-Conspirator-1, an inmate at MDC who is

housed in the MS-13 Unit and is also the defendant's maternal cousin. The defendant visited Co-Conspirator-1 at the MDC on or about November 24, 2024 at 2:03 p.m. Data obtained from LPR cameras in New York City for that date is consistent with the defendant driving the TOYOTA to and from the MDC to visit with Co-Conspirator-1.

15. Additionally, on December 13, 2024 at approximately 6:26 p.m., Co-Conspirator-1 engaged in an 11-minute call with the defendant, which was recorded by the BOP (the "Call").<sup>5</sup> During the Call, which was translated for me from Spanish to English by a federally certified Spanish interpreter, Co-Conspirator-1 stated, in sum and substance relevant part, "That errand has died, so I need you to tell the bosses there, not to be on that line because it's all fucked up . . . Tell our buddies so that they can tell the rest and send a message so that they can know to take it easy with that errand, because it's dead." Based on my training, experience and knowledge of the investigation, I believe that the "errand" refers to the attempted introduction of the PACKAGE containing contraband, and possibly additional shipments of contraband, to the MDC for the benefit of inmates in the MS-13 Unit.

16. On January 3, 2025, T-Mobile produced business records to the FBI for the 0669 Number (the "T-Mobile Records"). Based on these records, the defendant used the 0669 Number to communicate extensively around the time that the Walmart Phones were purchased and then subsequently delivered to the MDC. For example, as noted above, the

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<sup>5</sup> I believe that the person on the call with Co-Conspirator-1 is the defendant because when the defendant visited Co-Conspirator-1 on November 24, 2024 at the MDC, he gave his phone number, which ended in 0669 (the "0669 Number"), and the Call from the MDC by Co-Conspirator-1 is made to the 0669 Number. Additionally, the subscriber for the 0669 Number is the defendant's mother, and the 0669 Number was saved in the 2450 PHONE as "Jairon." Moreover, based on records obtained from the MDC, the 0669 Number is a contact for at least three known MS-13 members who are currently or were previously housed at the MDC, in addition to Co-Conspirator-1.

defendant appears to be holding a cellular telephone to his ear, at approximately 2:39 p.m., at the time he was exiting the Walmart. In a closer picture, below, captured from a different angle, the phone can be partially seen in his right hand:



Based on a review of the T-Mobile Records, the defendant who was using the 0669 Number, received a telephone call from the 2450 Phone on November 30, 2024 at approximately 2:21 p.m., which call lasted for approximately 18 minutes, i.e., inclusive of the period of time during which the defendant was in the Walmart.<sup>6</sup> Two hours later, the same two parties had an additional call which lasted more than 18 minutes.<sup>7</sup> A further review of the T-Mobile records revealed that the defendant received eight phone calls from the 2450 Phone on December 1, 2024, the date that the PACKAGE was delivered to the MDC, which total approximately 15 minutes of connecting time, as well as exchanging at least three text messages on that same date.

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<sup>6</sup> Additionally, there is a record of this call in the 2450 Phone, which reflects that the call lasted 18 minutes and 44 seconds.

<sup>7</sup> There is likewise a record of this call in the 2450 Phone, which reflects that the call lasted 19 minutes and 50 seconds.

Relatedly, between June 1, 2024 and December 13, 2024, the defendant had approximately 1100 contacts, including telephone calls and text messages, with the 2450 Phone.

17. Finally, on January 10, 2025, T-Mobile produced historical cell-site records for the 0669 Phone. The data produced establishes that the defendant, who was using the 0669 Number, was (1) present in Brooklyn on November 24, 2024, when he visited Co-Conspirator-1 at the MDC; (2) present in Islandia in close proximity to the Walmart on the afternoon of November 30, 2024; and (3) present in Brooklyn on the evening December 1, 2024, just prior to the attempted delivery of the PACKAGE to the MS-13 Unit.

WHEREFORE, your deponent respectfully requests that the Court issue an arrest warrant for the defendant JAIRON ORTEGA-COREA, so that he may be dealt with according to law.

WHEREFORE, your deponent further respectfully requests that this affidavit and the arrest warrant be filed under seal pending further order of the Court. The defendant is currently at liberty, and the government seeks to seal this affidavit and arrest warrant to ensure that the defendant does not learn that he has been charged, which could cause him to flee justice to avoid arrest and prosecution.

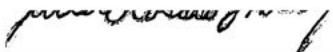
*/s/ Brendan Mooney*

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BRENDAN P. MOONEY

Special Agent, Federal Bureau of Investigation

Sworn to before me this  
18 day of February, 2025

**s/ Arlene R. Lindsay**



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THE HONORABLE ARLENE R. LINDSAY  
UNITED STATES MAGISTRATE JUDGE  
EASTERN DISTRICT OF NEW YORK